

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

WALKME LTD.,

Plaintiff,

v.

WHATFIX INC.,

Defendant.

C.A. No. 23-227-MN

**WHATFIX INC.'S MOTION TO  
CONTINUE STAY FOR THE DURATION OF ITS APPEALS**

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*Attorneys for Defendant Whatfix Inc.*

Dated: April 18, 2025

Defendant Whatfix Inc. (“Whatfix”) hereby moves this Court, pursuant to Federal Rules of Civil Procedure 26(b) and 26(c), to enter an Order, substantially similar to the proposed order attached hereto, granting Whatfix’s motion and continuing the present stay in this case (D.I. 52) pending resolution of Whatfix’s Federal Circuit appeals of the final written decisions of the Patent Trial and Appeal Board regarding the patentability of 15 claims of Plaintiff WalkMe Ltd.’s (“WalkMe”) asserted patents in this action. Whatfix submits this motion in the event the Court does not grant the parties’ Stipulation and Joint Motion Regarding Stay (D.I. 57). In support of its motion, Whatfix relies upon its opening brief in support of its motion, the pleadings, records, and files of which this Court may properly take judicial notice, and such other evidence and arguments as the Court may receive prior to its decision.

Dated: April 18, 2025

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**CERTIFICATION PURSUANT TO D. DEL. LR 7.1.1**

Pursuant to District of Delaware Local Rule 7.1.1, the undersigned hereby certifies that a reasonable effort was made to reach agreement with opposing counsel regarding the subject matter of this Motion, but no agreement was reached. On April 18, 2025, counsel for the parties, including Delaware counsel for Whatfix and WalkMe, discussed the relief sought herein via telephone conference, and counsel for the parties further communicated regarding the relief sought herein via email. WalkMe's counsel has stated that WalkMe opposes the relief sought by this motion.

Dated: April 18, 2025

/s/ Anne Shea Gaza  
Anne Shea Gaza (No. 4093)